

JOSEPH P. CAPONE



ATTORNEY AT LAW
Member of Pennsylvania and New Jersey Bars
2332 South Broad Street
Philadelphia, PA 19145

Cell: (215) 300-9045
Tel: (215) 557-0070
Fax: (267) 535-2743 Direct

Michele Magazzu, Paralegal
www.caponelawyers.com
joseph@caponelawyers.com

May 31, 2023

The Honorable Jeffrey L. Schmehl
5613 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

Re: United States vs. Michael Neill
Indictment No. 19-64-04

Dear Judge Schmehl,

After consultation, once again with my client as well as a discussion with the Assistant United States Attorney's office, I am respectfully requesting that we postpone the sentencing in this matter until such time as the case in chief is resolved or until such time as the Court is inclined to hear the matter at the appropriate time. It appears that the December, 2023 dates given to similarly situated defendants are within the range contemplated by the Court. That is equally acceptable to us. There is no objection from the US Attorney's office.

Thank you for your consideration of this correspondence and its content.

Respectfully yours,

/s/ ***JOSEPH P. CAPONE***

JOSEPH P. CAPONE

JPC/mm

cc: All Counsel of Record
United States Attorney's office
Michael Neill